

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:

TRAVIS JEVON WINN
RUTH GRISELDA WINN
DEBTORS

§
§
§
§
§

CASE NO. 20-50799

CHAPTER 7

**MOTION FOR ENTRY OF AGREED ORDER LIFTING STAY AND
NOTICE TO PARTIES IN INTEREST PURSUANT TO BANKRUPTCY RULE 4001(d)**

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.
IF NO TIMELY RESPONSE IS FILED WITHIN 14 DAYS FROM THE DATE OF SERVICE, THE
RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.
A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW, FORD MOTOR CREDIT COMPANY LLC, a secured creditor of the Debtors, by its attorney, and would respectfully show the Court as follows:

1. Movant FORD MOTOR CREDIT COMPANY LLC ("Movant") seeks relief from the automatic stay as to a 2017 FORD F150, bearing Vehicle Identification Number 1FTEW1CP3HKD17502.

2. Movant and the Debtors TRAVIS JEVON WINN and RUTH GRISELDA WINN ("Debtors") have reached an agreement regarding the relief sought.

3. A true and correct copy of the agreement in the form of a proposed Agreed Order is submitted herewith.

WHEREFORE, PREMISES CONSIDERED, Movant FORD MOTOR CREDIT COMPANY LLC prays that the Court enter the proposed Agreed Order and for all other relief, both legal and equitable, to which it may be entitled.

Respectfully submitted May 5, 2020.



R. LEE TURBYFILL
lturbyfill@dntlaw.com (E-mail)
Texas State Bar No. 24075191
ATTORNEY FOR MOVANT
FORD MOTOR CREDIT COMPANY LLC

OF COUNSEL:
DEVLIN, NAYLOR & TURBYFILL, P.L.L.C.
5120 Woodway, Suite 9000
Houston, Texas 77056-1725
713/622-8338 (Phone)
713/586-7053 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2020, a true and correct copy of the above and foregoing document shall be served by electronic means, if available, otherwise by first class mail as follows. Movant has complied with Local Rule 9013(g).

- | | |
|--|---|
| <p>(1) Counsel for Debtor (via ECF) J. Todd Malaise 909 NE Loop 410, Suite 300 San Antonio, Texas 78209</p> | <p>(3) The United States Trustee (via ECF) Office of the United States Trustee 615 E. Houston Street, Suite 533 San Antonio, Texas 78205</p> |
| <p>(2) Debtor (by regular first class mail) TRAVIS JEVON WINN 1176 Creek Canyon New Braunfels, Texas 78132</p> | <p>(4) Chapter 7 Trustee (via ECF) Johnny W. Thomas 1153 E. Commerce San Antonio, Texas 78205</p> |
| <p>(2) Debtor (by regular first class mail) RUTH GRISELDA WINN 1176 Creek Canyon New Braunfels, Texas 78132</p> | <p>(5) Parties Requesting Notice of Service (via ECF)</p> |



R. LEE TURBYFILL